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United States of America

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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 ERIC TERRELL CHRISTIAN,  
15 Defendant.  
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CASE NO. 2:22-CR-00196-WBS  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER  
DATE: March 27, 2023  
TIME: 9:00 a.m.  
COURT: Hon. William B. Shubb

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on March 27, 2023.  
21 2. By this stipulation, defendant now moves to continue the status conference until June 5,  
22 2023 at 9:00 a.m., and to exclude time between March 27, 2023, and June 5, 2023, under Local Code  
23 T4.  
24 3. The parties agree and stipulate, and request that the Court find the following:  
25 a) The government has represented that the discovery associated with this case  
26 includes over 160 gigabytes of discovery, including police reports, body camera footage,  
27 criminal history documents, and two forensic extractions of a cellular telephone. All of this  
28 discovery has been either produced directly to counsel and/or made available for inspection and

1 copying. The bulk of this discovery consists of the forensics extractions.

2 b) Counsel for defendant desires additional time to review this discovery, consult  
3 with her client, conduct investigation and research related to the charge, to discuss potential  
4 resolutions with her clients, and to otherwise prepare for trial.

5 c) Counsel for defendant believes that failure to grant the above-requested  
6 continuance would deny her the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the  
10 case as requested outweigh the interest of the public and the defendant in a trial within the  
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
13 et seq., within which trial must commence, the time period of March 27, 2023 to June 5, 2023,  
14 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
15 because it results from a continuance granted by the Court at defendant's request on the basis of  
16 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
17 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 20, 2023

PHILLIP A. TALBERT  
United States Attorney

/s/ ADRIAN T. KINSELLA  
ADRIAN T. KINSELLA  
Assistant United States Attorney


Dated: March 20, 2023

/s/ MEGHAN MCLOUGHLIN  
MEGHAN MCLOUGHLIN  
Assistant Federal Defender  
Counsel for Defendant  
ERIC TERRELL CHRISTIAN

**ORDER**

IT IS SO FOUND AND ORDERED.

Dated: March 20, 2023

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE